



CITY OF DETROIT
BUILDINGS, SAFETY ENGINEERING AND ENVIRONMENTAL DEPARTMENT
ADMINISTRATION

R05-15-A-062

COLEMAN A. YOUNG MUNICIPAL CENTER
2 WOODWARD AVENUE, FOURTH FLOOR
DETROIT, MICHIGAN 48226
WWW.DETROITMI.GOV

December 18, 2014

Environmental Management Support, Inc.
Attn: Mrs. Edie Findeis Cromwell
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910
Phone: 301-589-5318

**RE: Proposal for FY 2014 Brownfields Site-Specific Assessment Grant
Detroit, Michigan**

a. Applicant Identification:

City of Detroit
Building, Safety Engineering & Environmental Department (BSEED)
2 Woodward Avenue Ste. 401
Detroit, MI 48226

b. DUNS Number:

96-2071494

c. Funding Requested:

- i) Grant type: Assessment
- ii) Federal Funds Requested: \$200,000. A cost-share waiver of \$150,000 is requested.
- iii) Contamination: Hazardous Substance
- iv) Site-Specific

d. Location:

City of Detroit, County of Wayne, State of Michigan

e. Property Name and Address

Riverside Park (Parcel #3)
3085 West Jefferson Ave.,
Detroit, Michigan 48216

f. Contacts

- i) Project Director:
Raymond A. Scott, MPH, General Manager
City of Detroit, BSEED
2 Woodward Ave., Suite 401
Detroit, MI 48226
(313) 471-5108 (313) 224-1467 Fax
scottr@detroitmi.gov

- ii) Chief Executive:
Mayor Michael Duggan
City of Detroit Mayor's Office
2 Woodward Ave., 1126 CAYMC
Detroit, MI 48226
(313) 224-3400 (313) 224-4133 Fax
dugganm@detroitmi.gov

g. Date Submitted:

December 19, 2014 via the United States Postal Service.

h. Project Period:

Less than three (3) years upon receiving notice of award.

i. Population: (Source: 2013 Estimated Census Data):

- i) City of Detroit Population: 701,475
- ii) We are a municipal form of government.

j. Other Factors:

Appendix 3, the "Other Factors" Checklist is attached. This proposal meets five of the special considerations listed in the Checklist - 1) Recent natural disaster in 2014 that occurred within the community, causing significant community economic and environmental distress; 2) The project is primarily focusing on Phase II assessments; 3) The City of Detroit (Detroit) has firm leveraging commitments for facilitating the completion of our brownfield project; 4) Detroit has experienced significant plant closures as a result of the downturn within the automotive industry due to bankruptcy and economic disruptions within the project area; and 5) Detroit is experiencing a significant economic disruption resulting in a significant percentage loss of community jobs and tax base. Furthermore, Detroit has recently emerged from a Chapter 9 Bankruptcy, the largest municipal bankruptcy in US history.

Please refer to the attached narrative proposal and attachments in support of our request. If you have questions or require additional information, please contact the Project Director at (313) 471-5108.

Sincerely,



Raymond A. Scott, MPH
General Manager

cc: Brad Bradley, USEPA Region V
Romona Smith, USEPA Region V
Mike Duggan, Mayor of Detroit
Eric Jones, Director of BSEED

Enclosure

V.B Ranking Criteria for Assessment Grants

City of Detroit

FY 14 Brownfields Site-Specific Assessment Grant Proposal: EPA-OSWER-OBLR-14-07

1. Community Need

a. Targeted Community and Brownfields

i. Targeted Community Description: The City of Detroit (Detroit) is bound by the Detroit River to the south connecting Lake St. Clair from Michigan's upper region to Lake Erie at the lower region. The Detroit River serves as both a magnificent natural resource and a gateway for international commerce, connecting local communities like Detroit and its surrounding communities to Canada. The presence of this great waterway had enabled this region to grow into an international automotive powerhouse where automotive manufacturing grew and provided opportunity to millions of people living in Southeast Michigan. However, over the last 60 years, many of the businesses closed or moved, leaving behind scarred and contaminated land. This is especially true for domestic automotive manufacturers during the 2000 decade. At the beginning of 2000, Michigan began to show a significant decline in automotive manufacturing and related businesses due to globalization and automotive company restructuring. Michigan had a single-state recession in 2002. The national recession of 2007 to 2012 had exacerbated the bad economic problems, particularly those realized within Detroit.

Southwest Detroit referred to hereafter as the targeted community is bordered by the Detroit River (south), city of Dearborn (west), downtown Detroit (east), and neighboring Detroit communities to the north. Southwest Detroit (106,407 population¹) is one of the most culturally diverse communities in Michigan housing Hispanic/Latino (41,328 population¹), Black/African American (41,580 population¹), White (19,369 population¹), Asian, Arab American Indian, and Alaska Native (4,130 population¹) residents. As such, rich cultural and ethnic festivals occur weekly during the summer months showcasing their respective customs. Due to its vibrant nature, Southwest Detroit has the fastest growing population within Detroit, and southeast region of Michigan in general.

The Brownfield property to be assessed under this grant is Riverside Park. Riverside Park is situated on the eastern tip of Southwest Detroit, directly adjacent to, and north of the Detroit River. The Detroit Recreation Department (Recreation) Parks Strategic Master Plan allows for Riverside Park to offer a balance of active and passive outdoor recreational activities to the surrounding neighborhood. The total area of Riverside Park is 30 acres, comprised of three distinct parcels, #1 through #3. The park allows for residents to enjoy a green space venue within walking distance of their home. Riverside Park provided an enjoyable destination place where children played and picnics, fishing, horseshoes, little league baseball and soccer games, as well as tournaments were held.

In August 2011, Riverside Park was closed by Recreation due to contamination observed while making park improvements. The closure of the park has devastated the targeted community, as this was considered the destination point where all residents had things in common. For the purposes of this grant, Parcel #3, which is 10 acres in size, has been identified as the area of concern. All three parcels have been assessed with the assistance of the Michigan Department of

¹According to Data Driven Detroit 2010 U.S. Census at <http://www.datadrivendetroit.org/>.

Environmental Quality - Remediation & Redevelopment Division (MDEQ-RRD); however, Parcel #3 possesses unique challenges that are outside the realm of MDEQ's Surface Water Quality Initiative Fund (SWQIF) for this level of effort. The focus of this grant is to assess hazardous materials on Parcel #3. The additional information provided by this grant will address data gaps and allow for a comprehensive cleanup strategy to be formulated.

Upon reopening Riverside Park, the planned end use will remain a park and will incorporate additional walkable green space as the western phase of the Detroit International Riverwalk (Riverwalk) will terminate at the park. The Riverwalk consists of a 5½ mile opened riverfront view that incorporates a pedestrian and bike path along the Detroit River. The first phase of work has been completed on the East Riverfront - 3½ miles from Gabriel Richard Park to Joe Louis Arena. The focus has now shifted towards the West Riverfront – 2 miles from Joe Louis Arena to Riverside Park. The city of Detroit, Detroit Riverfront Conservancy, General Motors, state of Michigan, Kresge and Johnson Foundations are major forces in supporting and endorsing the creation and preservation of green and open space within Detroit.

ii. Demographic Information:

	Targeted Community (SW Detroit)	City of Detroit	State (Michigan)	National
Population	106,407 ⁶	701, 475 ²	9,895,622 ²	308,745,538 ¹
Unemployment	16.9% ⁴	16.9% ⁴	7.1% ⁴	6.7% ⁴
Poverty Rate	38.0% ⁶	38.1% ³	16.3% ³	11.8% ³
Percent Minority (2010 data)	81.8% ⁶	92.2% ²	23.9% ²	26.70% ²
Per Capita Income (2010 ACS data)	\$13,114 ⁶	\$14,861 ³	\$25,547 ³	\$28,051 ³
Median Household Income	\$27,358 ⁷	\$26,955 ³	\$48,471 ³	\$51,371 ³
Other: Single Female Head of Family Households	Unknown	29.4% ⁵	12.8% ⁵	13.0% ⁵

¹Data is from the 2010 U.S. Census data and is available at <http://www.census.gov/>.

²Data is from 2013 Estimated U.S. Census data as of 12/11/2014 and is available at <http://quickfacts.census.gov/qfd/states/26/26163.html>

³Data is from 2009-2013 Estimated U.S. Census data as of 12/11/2014 and is available at <http://quickfacts.census.gov/qfd/states/26/26163.html>

⁴Data is from the Bureau of Labor Statistics and is available at www.bls.gov

⁵Data is from 2009-2013 American Community Survey 5 year estimates and is available at <http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml>

⁶Data from Data Driven Detroit and available at <http://datadrivendetroit.org/projects/city-council-elections-by-district/>

⁷Data is from 2009-2013 American Community Survey 5 year estimates and is available at http://factfinder2.census.gov/faces/nav/jsf/pages/community_facts

iii. Brownfields: According to MDEQ-RRD, Detroit has more brownfield sites than any other community within the state, estimating that over 1,000 brownfield sites exist within the city alone, with a majority of the brownfields being located within the targeted community. The targeted community is considered the major industrial hub of Southeast Michigan. It hosts large and small industries (i.e., auto parts manufacturing plants, a refinery/petroleum storage terminal, coking plants, cement plants, steel plants, waste water treatment plant, etc.), truck traffic, freeways, rail and an international border crossing all of which contribute to environmental

impacts, such as, odors, contaminated land, property abandonment... and an abundance of brownfield sites.

The size of an average brownfield site in this area can range anywhere from the size of a residential lot (~0.25 acres) to an industrial factory (>100.0 acres). The majority of site impacts are due to historical industrial activities resulting in contamination from the use of petroleum and/or hazardous substances. As such, these sites are impacted with heavy metals, volatile organic compounds, and polynuclear aromatic hydrocarbons.

There are several brownfield sites within the targeted community in close proximity to Riverside Park. A few of the sites are as follow: 1) Anaconda Copper and Brass: former brass manufacturing and tire recycling/shredding facility approximately 11 acres in size; contaminants included PCBs, above ground storage tanks (ASTs), 55 gallon drums, tires, debris, etc.; 2) Michigan Consolidated Gas: Station H, former gasification plant that closed in 1945 and was sold to a charcoal company and finally to a scrap iron company; contaminants included benzene, xylene, toluene, and cyanide; and 3) St. Anne's Gate: former industrial property contaminated by lead, arsenic, and six underground storage tanks (USTs). Funding provided by the state of Michigan through the Clean Michigan Initiative (CMI) and administered by MDEQ-RRD was used to address brownfields within the targeted community. The CMI funds have assisted in assessing and remediating the worse sites neighboring Riverside Park.

iv. Cumulative Environmental Issues: Residents within the targeted community are more likely to be exposed to sources of particulate matter (PM_{2.5}) than residents living in other areas of the city due to the density of traffic and industrial facilities. Asthma triggers, such as, dust, smog, industrial and diesel pollution and strong odors are high. The targeted community has the State's only oil refinery, three steel mills and one of the nation's largest single-site wastewater treatment plants serving 126 suburban communities (~4 million people). According to the results of Southwest Detroit Environmental Vision's (SDEV) USEPA CARE project, approximately 20% of vacant lots in Detroit are located here. Abandoned buildings and lots attract illegal dumping that creates dangerous conditions (i.e., fires, illegal drug use, etc.), which decreases property value for the residents.

Families within this community face environmental justice issues daily, such as, trucks illegally using local streets, high numbers of asthma among children, unbearable odors, noise and vibration, toxins, soot and more. Several transit projects are slated for development within the next couple of years that will continue to impact the quality of life for the residents here, potentially exacerbating existing environmental justice issues and impacting public health. The three major transit projects in Southwest Detroit are the Detroit International Freight Terminal (DIFT), a proposed consolidation of intermodal freight terminals into a single facility, the New International Trade Crossing (NITC) a joint US and Canadian bridge crossing that will serve as the second international bridge in Southwest Detroit. The Gateway, a recently completed construction project combined two major freeway interchanges (I-75 & I-96), in order to improve the flow of traffic to and from Canada.

Although the abovementioned projects may impact the residents of the immediate area during construction, these projects are aimed at reducing traffic congestion, minimizing additional air quality concerns, as well as, spurring economic development. Investments are being made into the targeted community to minimize the health and environmental impacts from industrial

brownfield sites. However, brownfields affect the residents here daily and have had an overwhelming impact for generations to come. The USEPA grant would become the impetus for renewal of the targeted community by developing a buffer zone in conjunction with reopening the park for residents to enjoy a walkable green space venue within close proximity of their homes.

b. Impacts on Targeted Community: As stated above, the targeted community is the most heavily polluted and industrial zoned community in Michigan, as such residents are adversely impacted. The impacts of brownfield sites within the targeted community are further magnified when considering low income and minority populations. These populations have experienced disproportionate impacts due to heavy industry locating onto legally zoned industrial properties and the resident's inability to move due to financial hardship. Accessibility to health care is also problematic as the nearest hospital is greater than 10 miles from the targeted community, where many lack transportation.

Unfortunately, abandoned and contaminated industrial sites are part of everyday life for most residents within the targeted community. Many of the brownfields are adjacent to residential property, observed in route to and from school, work, and religious institutions. This has an overwhelming impact on our targeted community by 1) increasing health risks and environmental justice issues due to potential contaminants; 2) severely over-burdening our sensitive population (i.e., infants, seniors, persons with weakened immune systems, low income residents, etc.); 3) increased hospitalization; 4) decreased investment for new development due to impacted sites; and 5) contributing to the erosion of the exiting middle class residents, as they relocate to neighboring suburban communities.

Detroit has higher percentages of sensitive populations in Michigan. According to the Healthy Environments Partnership (HEP), a community-based participatory research project funded by the National Institute of Environmental Health Sciences, the rate of asthma hospitalization in Southwest Detroit is double the rate for Michigan residents, in general. In 2000, the cardiovascular disease mortality rate (per 100,000 population) in Detroit was 418, nearly double the national rate of 258; Southwest Detroit (targeted community) reported a rate of 462. According to a study completed by the University of Michigan, three of Michigan's most polluted zip codes are located in the targeted community (48217, 48210, and 48209); in addition, state air monitoring stations show that neighborhoods here have the highest amount of soot and other fine particulates in Michigan.

c. Financial Need

i. Economic Conditions: With Detroit's eroding tax base due to population loss (about 198,295), and a record number of homes in foreclosures (over 40,000 home foreclosures in Detroit during 2010 alone), the troublesome events limit the local municipalities' ability to attract other funding opportunities for the purposes of conducting a brownfield assessment and cleanup. To stabilize the city's budget, Detroit had to implement a budget deficit reduction plan to include employee layoffs and cutting wages and benefits of those that remain. Detroit has recently emerged from Chapter 9 Municipal Bankruptcy, the largest Municipal Bankruptcy in this country's history. Due to the severe budget constraints, Detroit does not have the ability to finance brownfields site activities.

During the last decade, Michigan has suffered the highest manufacturing job loss in the nation due to large numbers of automotive plant closures. The Detroit/Wayne County area is at the center of this great national economic problem. From 2005 to 2009, several major manufacturing companies located within Detroit, such as General Motors, Chrysler Corp, Visteon Corp., Lear Corp., Delphi Corp, and Mexican Industries had filed bankruptcy. The job loss became especially significant as General Motors and Chrysler Corp restructured under bankruptcy in 2009. The failure of these large automotive companies had created a severe ripple effect on other industrial and commercial businesses throughout the region. Detroit area had lost over 323,400 jobs just in the 2008-2009 recession alone (Brooking Institution's study in 2010). The flooding event in August 2014, and subsequent disaster declaration has also had a severe economic impact on the targeted community, with more than \$230 million dollars of disaster assistance for the state of Michigan being approved by the Federal Emergency Management Agency (FEMA) thus far. This does not include the losses of personal property that cannot be covered by FEMA.

ii. Economic Effects of Brownfields: The poverty rate in Detroit stood at 38.1% in 2012, compared to Michigan's poverty rate of 16.3%. According to the 2010 US Census data, Detroit's poverty rate was at 24.99%, compared to Michigan's poverty rate of 15.5%. This equates to the poverty rate increase of 52% in Detroit from 2010 to 2012. Especially hard hit were single mothers with children younger than 18, whose poverty rate was 49.6% in 2010 in the City. The poverty rate for unemployed people is 57.5%. If both single mothers with children younger than 18, and unemployed people were adjusted at 52% increases, the results would be catastrophic. Detroit's unemployment rate is more than double that for Michigan and per capita income in the targeted community is nearly half that of Michigan. These populations suffer from both the health and financial effects of brownfields, which have lead to disinvestment, reduced tax base and loss of jobs.

There are 40,077 blighted, vacant structures, 38,429 structures with indicators of future blight, and 6,135 blighted vacant lots in Detroit². The city is now undertaking probably the largest blight removal program ever attempted to remove these blighted structures and address these blighted lots. The depression of property values brought on by brownfields has lead to disinvestment and abandonment of properties in Detroit causing this incredibly large problem with blighted vacant structures. By addressing brownfields and blight, the city can remove hazardous situations, add more green space, stabilize property values which all serve to reduce further disinvestment and encourage new future investment in the city.

2. Project Description and Feasibility of Success

a. Project Description

i. Project Description: The Riverside Park (Parcel #3) is located between West Jefferson Ave and the Detroit River and west of 24th Street, Detroit, Michigan. Parcel #3 is an open recreational space, approximately 10 acres. A concrete walkway is located on the southern portion along the Detroit River. A northeastern quarter portion of the site serves as asphalt paved parking spaces. The center and west portions of the site are the grassy area and serves as the main attraction for the total park space. There are no structures located on site, as the main use is outdoor recreational.

² According to the Detroit Blight Removal Task Force Plan, May 2014

An environmental investigation was performed by TEI Environmental Solution in 2012, which revealed levels of hazardous substances exceeding MDEQ's applicable cleanup criteria. As such, Recreation closed the entire park's public use until appropriate cleanup actions are implemented. However, prior to site cleanup, assessment activities are required in order to devise a remedial plan.

At the request of the city of Detroit, MDEQ-RRD conducted a limited remedial investigation (RI). The RI was funded by the State of Michigan's Surface Water Quality Initiative Fund (SWQIF) in the amount of \$160,000. SWQIF funding is statute limited for the strict purposes of conducting response activities as required to address existing or imminent unacceptable risks arising from conditions that contribute to nonpoint source water pollution. Under SWQIF, remedial investigation activities at Parcel #3 are limited to evaluating environmental contaminants, and associated pathways, that may be venting to a surface water body (e.g. – Detroit River). Due to the constraints of SWQIF, the MDEQ-RRD is unable to conduct a full assessment of the environmental conditions at Parcel #3. For example, the MDEQ-RRD is unable to directly evaluate the direct contact (e.g. soils that may come into contact by park visitors), soil volatilization to indoor air (e.g. – air within an on-site building), or the ambient air (e.g. – volatilization or organic compounds from contaminated soil or groundwater into the ambient air) pathways.

The intent of the Site-Specific Assessment Grant is to complement the historical and on-going investigation activities conducted by the MDEQ-RRD and complete a full site assessment. The grant would allow Detroit the ability to complete the investigation, close data gaps previously identified, and develop a focused feasibility to support a remedial action plan. MDEQ-RRD and Detroit will work cooperatively toward the completion of a comprehensive site assessment and ensure that the use of grant funds is maximized.

Upon reopening Riverside Park, the planned end use will remain consistent with Recreation's Strategic Plan and in line with the targeted community's land use and revitalization plan (i.e., preservation of green and open park land allowing public access to the Detroit River). The redevelopment strategy includes incorporating the park as the terminus point to the western end of a 5½ mile opened riverfront pedestrian and bike path along the Detroit River.

ii. Project Timing: Upon awarding of grant funds, the city of Detroit Buildings, Safety Engineering and Environmental Department (BSEED) and Recreation will work with the Southwest Detroit Business Association (SDBA), and SDEV to develop a community notification strategy using meetings, mailings, newsletters, postings etc. The first community notification will take place within 30 days of the grant being awarded. With input from MDEQ-RRD, an environmental consultant will be hired by BSEED within 90 days of the grant being awarded to complete the assessment activities. The greatest amount of time will be used for assessment activities. Within 30 days of being contracted, the qualified environmental consultant will submit the Site Specific Work Plan (SSWP) and Quality Assurance Project Plan (QAPP) to BSEED and USEPA. Once the SSWP and QAPP have been approved by the USEPA, the qualified environmental consultant will conduct site assessment activities and focused feasibility analysis, which may take up to 24 months. There will be no access issue for our environmental consultant as the park is owned by Recreation. Reporting, including quarterly reports and ACRES will be done by the consultant. Ongoing community outreach will be handled, as needed by BSEED in partnership with their community partners.

iii. Site Selection: Riverside Park is located within the city's most multicultural and diverse community. The park is situated alongside the Detroit River and has a new riverfront promenade that provides a stunning view of the Ambassador Bridge, the bridge linking Canada to the United States, downtown Detroit skyline, Windsor, Ontario, and river activities. The property was acquired by the city of Detroit via its Recreation department over ninety five (95) years ago, and accounts for more than 30 acres of prime park property. The city of Detroit is not the liable party. Riverside Park (Parcel #3) was purchased by the city of Detroit in 1919. The city of Detroit has not conducted nor allowed any activities on site that would have contributed to contamination. Furthermore, the acquisition of Riverside Park by the city of Detroit predates any environmental regulations and due diligence guidance.

Parcel #3 is designated as the open space family venue for recreational activities has been identified as the area of concern, consisting of 10 acres. While under construction for park improvements mobile non-aqueous phase liquids (NAPL) were observed. As a safety precaution, Recreation closed the park and followed up with a limited Phase II environmental site assessment. The assessment revealed elevated levels of volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PNAs), and NAPLs, exceeding MDEQ's Part 201 Residential Cleanup Criteria. As a result of the park's closure, many of Southwest Detroit's traditional out-door recreational activities and sports tournaments have been canceled or postponed, if another venue was not found in close proximity. This project addresses one of the highest profiled environmental, economic and quality of life projects in the City. It is our goal to remedy the source areas in order to reopen park as the only riverfront recreational venue within the targeted community.

b. Task Description and Budget Table

i. Task Description: BSEED is highly experienced in managing USEPA assessment grants and environmental contractors. The budget associated with each task is based on current and previous contractor quotes and payments that have been provided to and paid out by BSEED.

Task 1 - Work Plan and QAPP: Contractual Cost: 1) Review available environmental data and reports in order to compose and submit the Site Specific Work Plan (SSWP) to USEPA. The data review and work plan is expected to take 11 hours at a cost of \$55.00 per hour (~\$600). 2) Complete and submit the QAPP and receive approval by USEPA. Based on cost from QAPP's that have been submitted from other BSEED projects, \$5,000 has been budgeted for the QAPP under this grant. Selection of professional consultants will comply with the procurement procedures contained in 40 CFR 31.36. Total cost for this task is \$5,600.

Task 2 - Environmental Site Assessments: In addition to Task 1, the selected qualified environmental consultant will conduct environmental assessment activities to include: a Phase I Environmental Site Assessment (ESA), and Phase II ESA. Assessment activities will be conducted in accordance with current ASTM Standard Practice for ESA's (ASTM E 1527-13 and 1903). Phase I ESA will be conducted at a cost of \$3,000. The majority of the grant funding will be used for a Phase II ESA to include a data gap analysis involving soil and ground water sampling to support a remedial action plan. The cost of for this task \$182,450. The focus feasibility study will include an evaluation and interpretation of the data gap analysis in an effort to provide the most cost effective remedial option. We are requesting a funding waiver of \$150,000 to conduct this study and all supportive assessment and investigative work (refer to the

attached justification letter). Non-grant supplemental work includes investigative planning, and data analysis, and report compilation by MDEQ-RRD. The output will be a comprehensive environmental assessment and remedial action plan (if funding waiver is awarded).

Task 3 – Outreach: Includes community notification of the grant award, updates to partner organizations, meetings, mailings, newsletters, postings, etc., participation in community events or activities to educate the residents about site assessment activities, and environmental conferences/trainings. Also included are public notifications, signs, and other items that may be used to increase awareness of site assessment activities (e.g., supplies for community events, meetings, site signage, and/or dissemination of Phase II ESA results and grant updates) will be at a cost of \$2,000. Travel expenses for BSEED staff to attend the National Brownfields Conference(s), workshops and other educational events regarding EPA and state laws, rules, regulations and updates regarding Brownfield sites is estimated to cost \$6,000.

Task 4 - Reporting and Closeout Preparation of quarterly progress reports, financial reports and final closeout make up this task. \$5,000 for Contractual costs. Reporting, including ACRES and quarterly reports are estimated to take 4.5 hours per quarter at \$55 per hour for 12 quarters (~\$3,000) and final close out of the grant cost of \$1,000. All other reporting will be handled by BSEED. The task output will be successful completion of all grant requirements.

ii. Budget Table:

Budget Categories	Project Tasks				
(programmatic costs only)	Task 1 – Work Plan & QAPP	Task 2 – Environmental Site Assessments	Task 3 – Outreach	Task 4 – Reporting & Closeout	Total
Personnel					0
Fringe Benefits					0
Travel			\$6,000		\$6,000
Equipment					0
Supplies			\$2,000		\$2,000
Contractual	\$5,600	\$182,400		\$4,000	\$192,000
Total	\$5,600	\$182,400	\$8,000	\$4,000	\$200,000

c. Ability to Leverage: Within the past three years, the state of Michigan through its MDEQ-RRD has been working cooperatively with BSEED to assess and ultimately remediate environmental conditions at Parcel #3. To date, MDEQ-RRD has leveraged \$160,000 to conduct a limited remedial investigation (RI). The RI was funded by the State of Michigan's Surface Water Quality Initiative Fund (SWQIF). Under SWQIF, MDEQ-RRD is able to evaluate environmental contaminants and associated pathways at Riverside Park that may be venting to a surface water body (e.g. – Detroit River). Through this grant, BSEED will be able to complement MDEQ-RRD's work by investigating and addressing data gaps that were not allowable under SWQIF and maximizing the use of USEPA's assessment grant funding.

Recreation is committed to leveraging an additional \$400,000 from Recreation-PARTNERS & General Obligation Bond. This investment will be used for park improvements, including

benches, drinking fountains and additional launch ramp improvements once environmental assessment and remedial activities are complete and the park is reopened.

Riverside Park is the terminus point for the 5½ mile Detroit International Riverwalk (Riverwalk). The Detroit Riverfront Conservancy (Conservancy) is the Authority managing the Riverwalk and responsible for facilitating events to fund construction and operations of the Riverwalk. The Conservancy will spend approximately \$8 million at Riverside Park for the development of a plaza, pavilion, restroom facilities, concession space, as well as, beautiful garden room areas. Thus far \$65 million has been spent developing the Riverwalk.

BSEED has a history of leveraging additional funds through state of Michigan grant funding, cost recovery actions, technical assistance, and USEPA Brownfield Grants. BSEED will apply for a state of Michigan and USEPA cleanup grants to remediate Riverside Park, so it can be reopened to the public. BSEED was awarded an FY07 USEPA Cleanup grant in the amount of \$200,000 and was able to leverage over \$57,000 for cleanup that resulted in a \$20 million redevelopment project (refer to section 5c.i.2.).

3. Community Engagement and Partnerships

a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress

i. Community Involvement Plan: The targeted community is home to many active community groups that care deeply about the conditions of their neighborhood. BSEED has developed partnerships with two community groups that have both agreed to support and commit their resources to this project, SDEV and SDBA. See attached support letters. Both groups play a large active role within the community and have a positive influence on blight removal, redevelopment, grant dollars invested, and public outreach. These groups are often used to serve as a liaison between public/private entities and the residents. The assistance of both groups will enable BSEED to actively and effectively communicate the project goals, objectives, status, as well as receive feedback from the residents within the targeted community.

In addition, Southwest Detroit has one of the most influential and passionate state of Michigan Representatives, Rashida Tlaib. Representative Tlaib has a proven track record as it relates to environmental justice and disparate impacts for her constituents. As an active, “boots on the ground” Representative, Representative Tlaib, along with others, developed a network addressing the sensitive populations (e.g., elderly, children, under represented, etc.), and as such will be used to assist BSEED in reaching these individuals for input. As a partner, Representative Tlaib’s influence will be of great importance in ensuring the residents that the park was accurately assessed and properly remediated.

MDEQ-RRD will be intimately involved in the project by sharing data collected from their recent environmental assessment, advising and providing technical assistance on assessment activities, assisting with project planning, and remedial planning, as well as providing recommendations to BSEED on reopening the park.

BSEED and Recreation have already engaged SDEV and SDBA to distribute the initial notification and will continue to utilize their resources for routine updates. Recreation centers will house the community meetings where we are committed to holding at least 4 public meetings to involve the residents throughout the duration of the project. The targeted

community residents will be solicited by BSEED, Recreation, Representative Tlaib's office, SDEV, and SDBA to participate in site activities (e.g., planning, cleanup decision, and reuse planning phase). In order to protect the sensitive population and nearby residents, BSEED will require strict adherence to the SSWP, QAPP, and health and safety plan various related tasks. These documents will be considered "living" documents and modified as needed. Examples of tasks used to protect the residents include, but are not limited to: hours of operation, best route for site ingress and egress, odor and dust control, warning signs, and containment measures. The sensitive population will be encouraged to provide input on the project's plan.

ii. Communicating Progress: BSEED will collaborate with Recreation in all outreach and communication efforts. Recreation is able to reach the targeted community residents through their various community engagement programs and centers throughout Detroit. BSEED and Recreation will collect the contact information from all interested parties and provide meeting minutes that can be emailed and/or hard copy mailed upon request. Updates, meeting notices, and meeting minutes will be posted at Roberto Clemente recreation center, and posted on the City's website. If necessary, BSEED will work with SDEV and SDBA on multilingual literature to translate related information into Arabic and Spanish. Note: Additional languages can be translated, if requested. Signs will be placed at the project site, which will provide a description of the proposed project and the partners involved. An email address and telephone number will be provided to the residents with a means of direct communication to the project managers, so that comments and concerns can be addressed. Residents will be made aware that all documents, submittals, reports, etc. will be kept in the Administrative Record at BSEED office and available for public review. BSEED will also coordinate with our community organization partners to disseminate information and outreach. Based on BSEED's experience, the most appropriate and effective means of communicating progress to the targeted community were shown utilizing the abovementioned communication plan. There was an increase in attendance and response received from the residents regarding environmental activities. In addition, there are two community centers located within the targeted community that are frequented by the local residents

b. Partnerships with Government Agencies

i. Local/State/Tribal Environmental Authority: MDEQ-RRD is the state agency that manages the brownfield's program, voluntary cleanup and other similar environmental programs. MDEQ-RRD ensures contaminated properties are reliably managed, revitalized, and the environment is protected through compliance assistance, partnerships, collaboration, and enforcement. MDEQ-RRD is actively involved with BSEED regarding the guidance and compliance of ongoing assessment and proposed cleanup activities at Riverside Park. In order to ensure the success of our project, MDEQ-RRD will continue to partner with BSEED by: 1) advising and providing technical assistance on assessment activities; 2) assisting with project planning; 3) providing data from information collected from their current environmental activities at the project site; 4) assisting with remedial planning; and 5) providing recommendations to BSEED and Recreation on reopening the Park.

ii. Other Relevant Governmental Partnerships: The City, MDEQ-RRD and USEPA - Grosse Ile, Michigan are currently collaborating on several environmental assessments and clean-up projects within Detroit through the Redevelopment of Urban Sites (REUS) concept. The REUS "team" holds quarterly meetings to discuss current and future Brownfield sites, risk reduction,

issues and initiatives related to environmental and economic redevelopment, and most importantly, the protection of public health and environment. REUS representatives include BSEED, MDEQ-RRD, USEPA-Grosse Ile, Michigan, Detroit Economic Growth Corporation (DEGC), city of Detroit Planning and Development Department (P&DD), Recreation Department, Law Department (Law), Water and Sewerage Department (DWSD), and Department of Public Works (DPW). The REUS team has helped Detroit to complete numerous redevelopment activities by allocating and overseeing over \$100 million between 1995 and 2010. The USEPA Brownfield grant activities will serve as one of the REUS team's projects to ensure the success of the project. The input from these agencies will allow for efficiencies to be realized by maximizing resources, such as, technical expertise equipment and funding.

In addition, BSEED will continue to partner with the Recreation and General Service Department (GSD). Recreation owns and manages Riverside Park. BSEED will continue to advise and coordinate community outreach efforts and site access with Recreation. GSD is responsible for the security of the site. BSEED will work with Recreation and GSD to insure that the property is secure, barricaded, and restricted to public access during project activities and until the park is eventually reopened.

c. Partnerships with Community Organizations

i. Community Organization Description & Role:

Southwest Detroit Environmental Vision (SDEV): SDEV is a nonprofit organization that has been working for 22 years to improve the environment and economy in Southwest Detroit. Their role will be to disseminate project related information to the residents in the targeted community, assist with coordinating public meetings, community outreach, and play an active role in coordinating future uses of the park as it relates to green space development.

Southwest Detroit Business Association (SDBA): SDBA, a non-profit liaison, supports our community's vision for a healthy, vibrant neighborhood. The association is a coalition of businesses and community interests committed to facilitating the continuation and enhancement of a stable, economically healthy Southwest Detroit, and its neighboring communities. Their role will be to assist with public outreach & relations, disseminating project related information to the community, and putting the park back to use once the site is ultimately remediated.

ii. Letters of Commitment: Detailed description and role of the abovementioned community partners can be found within the attached commitment letters from each group.

4. Project Benefits

a. Health and/or Welfare and Environment

i. Health and/or Welfare Benefits: As was previously stated, the residents in the targeted community are burdened with rates of asthma incidence and cardiovascular disease that are the highest in Michigan. Geotechnical activities during the park's infrastructure improvements revealed that contaminants posed an unacceptable risk to the residents. Following further examination, Recreation made a decision to close the park until a more comprehensive assessment and remedial efforts are implemented eliminating all exposure pathways. The primary health or welfare benefit anticipated from the proposed project is it will allow for a complete assessment of contamination and for the ultimate remediation of the site. This will return valuable recreation and green space to its intended use. This grant would provide immediate health benefits by reducing residents' exposures to contamination. By providing a

clean and safe space for residents to be active, this grant contributes to the reduction of cardiovascular disease by reopening a walkable recreational venue for outdoor exercise activities. An additional benefit of this grant addresses mental health and wellbeing by providing a safe recreational area for residents to relax whereby reducing stress.

ii. Environmental Benefits: USEPA is well aware that brownfield sites have had an adverse affect by increasing health risks due to contaminants; decreased investment for new development, and contribute to the erosion of the existing middle class. Every site has its own issues and every success story reduces the adverse impacts and enhances the quality of life. Riverside Park assessment activities, once completed, will allow Detroit, along with our partners, to plan the best course of action to mitigate any exposure pathway to the public. Riverside Park has been closed for three seasons. Once remediation is complete, the proposed end use will remain the same according to Recreation's Parks Strategic Master Plan, and because the use will remain as a park, no residents will be displaced by this project's outcome.

The benefits to be realized with the cleanup of Riverside Park are to eliminate a source area of contamination to the public and environment, provide an outdoor recreational venue for that targeted community, complete the total 5½ mile pedestrian and bike path route along the riverfront, preservation of green and open space within Detroit, and become the economic impetus for those areas bordering the Riverwalk. As a testimony, Detroit has witnessed this transformation within the east riverfront district and truly believes that Riverside Park will be the catalyst for the west riverfront district.

b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

i. Planning, Policies, and Other Tools: Detroit was funded by a USEPA Region V Great Cities Sustainable Redevelopment Grant to conduct Best Management Practice - BMP (Grant # X7-9654201) study and develop a design guideline for sustainable land use on the riverfront. This grant was used to address the feasibility, site-specific development guidelines required redevelop a sustainable community in order to improve the environment, rather than perpetuate past practices. The Great Cities Sustainable Redevelopment project is currently addressing this need.

BMP practices are being strongly encouraged by several city departments. When developers, contractors, and builders meet with BSEED's Plan Review and Zoning divisions to submit their plans and obtain permits, they have an opportunity to discuss City's storm water management policy and how it impacts their project. Currently, a storm water drainage fee is attached to all commercial and industrial properties. The fee is at its lowest when projects incorporate the most pervious design/features. This alone has dramatically increased alternative storm water management practices, particularly for all new construction.

Riverside Park is located at the terminus of the west riverfront district. All major utility services currently exist in the area. Therefore, in order to minimize the impact resulting from new construction, projects within the district will be required to utilize all existing infrastructures and utility corridors. All construction components within the boundaries of the Riverwalk district are required to provide ample green space according to the district's master plan. Presently, Detroit is partnering in a HUD-funded demonstration pilot project for deconstruction of abandoned homes. Structures in the targeted area were identified for deconstruction by our local community partners. The building materials will be recycled instead of going to a landfill and a reduction in blight and illegal dumping in neighborhoods, where children are at risk for exposure.

ii. Integrating Equitable Development or Livability Principles: This grant proposal incorporates equitable development practices spurred by the Riverwalk development and livability principles by reducing toxicity in an existing neighborhood asset. This project will also improve access by existing residents to greenspace and recreational property, and retain residents who have historically lived in the area. The reopening of the park will promote walk-ability to and around the site and contribute to on-site stormwater management through green infrastructure.

c. Economic and Community Benefits (long-term benefits)

i. Economic or Non-Economic Benefits: There are tangible non-economic benefits associated with the reopening of Riverside. The planned end use will remain consistent with Recreation's Strategic Plan in terms of green space preservation and support for open park land. This green space creates the impetus of reuniting the community members and assists in sustaining strong neighborhood organizations. Riverside has often been viewed as a destination spot where young and old come to enjoy outdoor recreational activities. Recreation's Strategic Plan states that in communities where active parks are located, a decrease in crime, increase in property value, and greater sense of community is observed. This concept is further realized when organized sport venues are held creating a sense of community pride. The Parks reopening is considered a linchpin in the overall redevelopment and revitalization of the west riverfront district.

As the city works towards becoming a "green" city, the parks natural ability to absorb storm water is taken into consideration. The storm water management plan relies on Riverside remaining as a park. This is important as redevelopment of the surrounding properties is envisioned because the 5½ mile Riverwalk will terminate at the park. The development of the eastern section of Riverwalk has spurred bait shops, bike rental stations, convenience stores, office space, etc, as more people are drawn to the riverfront. The storm water management plan relies on Riverside remaining as a park.

Lastly, when health effects are considered, incorporation of a pedestrian and bike path with spectacular views of the Detroit River becomes important. The walk-ability concept falls within the City Master Plan of Development where Detroit is striving and making promising progress in increasing bike and walking paths throughout the city. Studies have shown that in neighborhoods that improve walk-ability and increase the opportunities for physical activity, positive health effects are seen.

ii. Job Creation Potential: Partnerships with Workforce Development Programs: Detroit is a 2014 recipient of a USEPA Environmental Workforce Development and Job Training Grant currently overseen by BSEED. As part of the job training grant, participants receive 40 hour HAZWOPER training which would qualify them to work on sites where environmental assessments are being conducted and hazardous materials are abated. Every effort will be made to use qualified environmental consulting firms that hired graduates of the Detroit Workforce Development and Job Training Grant.

5. Programmatic Capability and Past Performance

a. **Programmatic Capability:** BSEED's project team members are highly trained, technical professionals that are either certified as Professional Engineers or have Master's degree in Public Health or Science. Each individual has experience with grant management and has been well

trained in environmental sciences or engineering practices and participates in continuous educational opportunities to remain up to date on grant and environmental matters. BSEED's overall organizational structure to manage the grant will include the project manager, project team, Environmental Professional (EP - also referred to as environmental consultant), and administrative staff. BSEED's tasks will include, but are not limited to: reviewing all project reports and budgets, site inspection, field monitoring and all financial requirements of the project and grant. BSEED will select an Environmental Professional (EP) in accordance with the City's approved procurement process, as well as, the competitive Procurement Standards in 40 CFR Part 30 or 40 CFR 31.36 as appropriate to conduct assessment activities. Prior to selecting an EP, the City will place an open Bid for services, create a panel of qualified panelist to review proposals to select an EP that is the most qualified based on a competitive budget to complete tasks under this grant. The EP will be placed under a professional service contract approved by the Detroit City Council. The grant's project manager, Mr. Raymond Scott will oversee the performance of all grant activities, funding, reporting and environmental compliance. Mr. Scott will work closely with BSEED's project team during all phases of the project in order to ensure the successful implementation of the grant. The team assembled to provide successful management of the grant is as follow:

Raymond A. Scott, MPH - As General Manager of BSEED, Mr. Scott has over 20 years of environmental and industrial health management experience, Mr. Scott will provide the expertise to assure conformance with current environmental laws, regulations, and standards. Mr. Scott oversees all environmental Technical Program implementation, and compliance. Mr. Scott will provide oversight of this project and the EP and ensure that all technical, administrative and financial requirements are complete within the approved grant timeline.

LaReina Wheeler, MSA - Ms. LaReina Wheeler has more than 12 years of professional experience with BSEED as an Environmental Specialist; Ms. Wheeler is responsible for designing, developing, implementing and managing contract procurement policies and procedures; and programs, projects, processes, and procedures for environmental assessment, response and remedial activities in compliance for environmental programs. Ms. Wheeler will assist with project management, community outreach, coordination, routine inspections, progress reporting, review workplans/technical reports, and assist with quarterly reports and ACRES.

Paul T. Max - Mr. Paul T. Max brings more than 28 years of environmental health and industrial hygiene experience to BSEED. Mr. Max was previously employed by the Detroit Department of Health and Wellness Promotion as an Industrial Hygienist in the Environmental Health and Safety unit. Mr. Max is responsible for environmental assessment, response, feasibility study and compliance for environmental programs. Mr. Max will assist with management of the project, community outreach, technical support, oversight, review workplans/technical reports, inspections, and assist with quarterly reports and ACRES.

Administrative Staff - For this grant BSEED's administrative staff will be responsible for drawing down, accounting, processing, and submitting payments to approved Contractors/EP.

Lastly, Detroit has implemented internal financial control mechanisms in order to meet or exceed all federal and state grant guidelines regarding funding allocation. The city utilizes an Oracle based financial system called the Detroit Resources Management System (DRMS). By using DRMS, we are able to track and manage all fiscal activities. BSEED will be able to initiate the payment process beginning with the Federal Automated Standard Applications of Payment (ASAP) system, and follow it through DRMS to issuance of a check. Internal controls within the

DRMS system prevent overpayments and provide various approvals to ensure appropriate spending. BSEED will be the city agency to successfully manage all grant activities.

b. Audit Findings: The city of Detroit affirms that there have been no adverse audit findings from previous grants awarded to BSEED.

c. Past Performance and Accomplishments

i. Currently or Has Ever Received an EPA Brownfields Grant

1. Compliance with grant requirements: BSEED was awarded a FY 2014 USEPA Environmental Workforce & Job Training grant (JT-00E01370-0) in the amount of \$200,000 for a period of 3 years (October 1, 2014 – September 30, 2017). BSEED is in compliance with all grant requirements, work plan, schedule and all of the terms and conditions of the grant. As a new recipient, BSEED is making sufficient progress towards achieving the expected results of the grant. Our work plan has been approved by EPA, we have received our Cooperative Agreement, selected and contracted a Contractor, engaged our project stakeholders, and began program planning and outreach. BSEED plans on expending \$200,000 in grant funds by the end of the grant period by providing 40-hour HAZWOPER training, asbestos & lead abatement and CPR training to over 60 Detroit residents within a 2-year period. We are applying for the USEPA Site Specific Environmental Assessment grant to conduct assessment activities at Riverside Park. Detroit residents are being trained through our EPA Job Training grant for jobs in the environmental & construction field. Although the scopes of both grants are different, the works proposed are aligned to supplement each other.

BSEED was awarded two USEPA Brownfield Site Cleanup Grants in the amount of \$200,000 each, in September 2007. Cleanup Grant funded remediation activities were completed at the former Sears Retail Store and Auto Service Center (Assistance #BF00E40101-0) and at the former Globe Building site (Assistance #BF00E40001-0). The cleanup consisted of soil remediation through excavation and backfilling. BSEED completed cleanup activities at both sites within the schedule and achieved expected results of the grant. BSEED was in compliance with all grant requirements, work plan, schedule and all of the terms and conditions of the grant were met. All of our submittals were provided on time and accepted and approved by our Region 5 project manager. All quarterly reports were submitted on time, as well as, financial status reports and ACRES updates. The project was updated in Acres and Property Profile Forms were completed and submitted at the close of the grant. Project updates are continuously updated in Acres.

2. Accomplishments: **Former Globe Building project:** BSEED was able to leverage over \$57,000 as a cost share to complete the cleanup. BSEED was successful in cleaning up the site using the USEPA Brownfields Cleanup grant in two (2) years. As a result of our cleanup activity, the site has been redeveloped. Following our cleanup activity, Detroit Economic Development Corporation (DEGC) designed and installed a new green way (Dequindre Cut rail-to-trail) through the eastern lot of the Globe Building site. In addition, the Former Globe Building (former steam engine factory) has been redeveloped and is operating as the State of Michigan Outdoor Resource Center. DEGC estimated that the complete rehabilitation of the building and redevelopment of the site would be \$20 million. **Sears Retail Store project:** BSEED was able to leverage over \$217,000 as a cost share to complete the cleanup. BSEED was able to complete site cleanup through the USEPA Cleanup grant in less than one (1) year of the award. Both projects were updated in Acres prior to the submission of this proposal.

Appendix 3 Assessment Other Factors Checklist

Name of Applicant: City of Detroit

Please identify (with an *X*) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less.	
	Federally recognized Indian tribe.	
	United States territory.	
	Applicant will assist a Tribe or territory.	
	Targeted brownfield sites are impacted by mine-scarred land.	
	Targeted brownfield sites are contaminated with controlled substances.	
X	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress.	5
X	Project is primarily focusing on Phase II assessments.	7-8
X	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	8-9
X	Community experienced manufacturing plant/power plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant/power plant closures due to bankruptcy or economic disruptions.	1, 4, 5
X	Recent (2008 or later) significant economic disruption (<u>unrelated</u> to a natural disaster or manufacturing/auto plant/power plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	4, 5
	Applicant is one of the 12 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 12 recipients, or relevant pages from a recipient's IMCP proposal which lists/describes the core partners and implementation strategy parties. A core partner/implementation strategy party is a local partner organization/jurisdiction that will carry out the proposed strategy, as demonstrated in letters of commitment or memoranda of understanding which documents their contributions, roles, and responsibilities to the partnership. EDA may provide to	

	EPA a list of the core partners/implementation strategy parties for each of the 12 “manufacturing community” designees, which EPA would use to verify this other factor.	
	Applicant will serve an area designated as a federal, state, or local Empowerment Zone or Renewal Community. To be considered, applicant must attach documentation which demonstrates this current designation.	
	Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.	
	Applicant is a HUD Promise Zone community. To be considered, applicant must attach documentation.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

City of Detroit

FY 14 Proposal Brownfields Assessment Grant, Detroit, MI

EPA-OSWER-OBLR-14-07

III.C Threshold Criteria for Assessment Grants

1. Applicant Eligibility

The city of Detroit (City), located in Wayne County in the state of Michigan is the local unit of government as defined under 40 CFR Part 31, applying for a USEPA Site-Specific Assessment Grant for Hazardous Substance under the EPA Brownfield Assessment Grant Notice of Funding Availability. The city of Detroit, utilizing internal resources in planning, development, zoning, and land use authority will serve as the ultimate decision maker under the Site-Specific Hazardous Substance Assessment Grant. Assessment activities will be implemented and managed through the city's Buildings, Safety Engineering & Environmental Department - Environmental Affairs (BSEED).

2. Letter from the State or Tribal Environmental Authority

A current letter from the Michigan Department of Environment Quality, Remediation and Redevelopment Division (MDEQ-RRD) acknowledging and supporting the site assessment activities described herein and the City's plan to seek funding is attached to this proposal.

3. Community Involvement

BSEED has developed partnerships with two community groups that have both agreed to support and commit their resources to this project, Southwest Detroit Environmental Vision (SDEV) and Southwest Detroit Business Association (SDBA). The assistance of both of groups will enable BSEED to actively and effectively communicate the project goals, objectives, status, as well as, involve and receive feedback from the residents within the targeted community. In addition, southwest Detroit has one of the most influential and passionate state Representatives, Ms. Rashida Tlaib. Representative Tlaib has a proven track record as it relates to environmental justice and disparate impacts for her constituents. As an active, "boots on the ground" Representative, Representative Tlaib and her office has agreed to help with community outreach efforts and to disseminate information to their constituents and community members.

BSEED has already engaged the Detroit Recreation Department (Recreation), SDEV, SDBA, and Representative Tlaib's office to distribute the initial grant proposal notification and will continue to utilize their resources for routine updates. Recreation's recreation centers will house the community meetings, where we are committed to holding at least 4 public meetings to involve the community throughout the duration of the project. The targeted community residents will be solicited by BSEED, Recreation, Representative Tlaib's office, SDEV, and SDBA to participate in grant related activities (e.g., planning, cleanup decision, and reuse planning phase). The residents, especially sensitive populations will be encouraged to provide input on the project.

MDEQ – RRD will be intimately involved by sharing data collected from their recent investigation, advising and providing technical assistance on assessment activities, assisting with project and remedial planning, and providing recommendations to BSEED and Recreation on reopening the park. MDEQ-RRD will be invited to participate in all community efforts.

4. Site Eligibility and Property Ownership Eligibility

Site Eligibility:

a. Basic Site Information.

(a) Riverside Park - Parcel #3, (b): 3085 West Jefferson, Detroit, MI 48216; (c) City of Detroit.

b. Status and History of Contamination at the Site.

a. Based on limited investigation activities, both the soil and groundwater are impacted with hazardous substances.

b. Prior to 1906, Riverside Park (Parcel #3) was an open body of water connected to the Detroit River. In 1919, Parcel #3 was purchased by the City of Detroit from a private party. Between 1906 and 1928, Parcel #3 was filled-in with soils and developed into vacant land. The exact time period(s) soils were brought to the site is unknown. The site, which is approximately 10 acres, consists of an open grassy area, picnic tables and a riverfront promenade. Since Detroit's acquisition of the site, the site has solely been used as a public park.

c. To our knowledge, no activities have been conducted on Parcel #3 that would have resulted in contamination. Potential sources of contamination include fill material from an unknown source used to fill-in portions of the river to create land, and migration of contaminants from upland properties. Riverside Park is directly adjacent south of a former coal gas manufacturing plant (MGP) that operated between 1867 and 1954. Other historical industrial operations neighboring the site include tool and die facilities, foundries, and warehousing, all of which present recognized environmental concerns (RECs).

Two environmental investigations were conducted between 2012 and 2014, at Parcel #3. Based on the limited results obtained to date, both soil and groundwater are impacted by VOCs, PNAs, metals, and mobile non-aqueous phase liquids (NAPL) at varying depths (i.e., 12 - 14' below grade surface (bgs) and 28 - 31' bgs). Due to the limited data obtained thus far, it's not feasible to adequately assess Parcel #3. Additionally, the bulk of investigative activities have focused on evaluation of contaminants that may vent into the surface water (i.e., Detroit River). Detroit would like to address the data gaps by assessing direct contact (e.g. dermal absorption), soil volatilization to indoor air (e.g. air within a structure), or the ambient air (e.g. volatilization of organic compounds from contaminated soil or groundwater) pathways.

d. Insufficient information is available to determine the source(s) of contamination at Parcel #3. The extent of contamination revealed by the limited investigations indicate contamination along the shoreline (south – southeast) and property boundary

(W. Jefferson Ave., north – northeast). The depth of contamination range from 12 - 31' bgs. MDEQ-RRD has determined multiple contaminants (i.e., benzene and naphthalene) are present in soil and/or groundwater at concentrations exceeding applicable cleanup criteria.

c. Site Ineligible for Funding.

(a) Detroit affirms the site is not listed or proposed for listing on the National Priority List; (b) not subject to unilateral administrative order, court orders, administrative orders on consent, judicial consent decrees issued to or entered into Under CERCLA; and (c) not subject to the jurisdiction, custody, or control of the United States government.

d. Site Requiring a Property-Specific Determination.

Not applicable.

Property Ownership Eligibility:

e. CERCLA § 107.

Since owning the site, Detroit has operated the site exclusively as a Park. Prior to the City owning the site (1919), it was a part of Detroit River developed into vacant land using fill material. Detroit affirms that we are not potentially liable for contamination at the site under CERCLA §107. The property was acquired by Detroit via its Recreation department over ninety five (95) years ago, and accounts for more than 10 acres of prime park property. Detroit has not conducted nor allowed any activities on site that would have contributed to contamination. Furthermore, the acquisition of Riverside Park by the city of Detroit predates any environmental regulations and due diligence guidance.

f. Enforcement or Other Actions.

The site is not subject to known ongoing or anticipated enforcement or other legal actions related to the subject site (Riverside Park – Parcel #3).

g. Information on Liability and Defense/Protections Where Applicant Does Not Own the Site.

(a) Not applicable.

h. Information on Liability and Defense/Protections Where Applicant Owns the Site.

i) Information on the Property Acquisition

In 1919, the property/site, now referred to as Riverside Park (Parcel #3), was purchased by the city of Detroit from a private party, Estate of Edward W. Voigt. The City has sole ownership of the site. There are no contractual or financial relationships or affiliations with prior owner or operators.

ii) Timing and/or Contribution Toward Hazardous Disposal

Detroit has not contributed or arranged for the disposal or transport of hazardous substances at/to the subject site. Any disposal of hazardous substances would have occurred before the City acquired the property. Since Detroit's acquisition, the property was used exclusively as a park; there were no releases of hazardous substances during Detroit's ownership.

iii) Pre-Purchase Inquiry

Detroit acquired Riverside Park - Parcel #3 in 1919 (95 years ago). During this period, the bona fide prospective purchase requirements were not in effect. The site was considered pristine land, considering it was being developed into a vacant lot from an open body of water and was never developed or operated on prior to the City's acquisition. Assessment and remedial investigation activities weren't conducted on the property until contamination was discovered in 2011. Assessment activities were conducted from 2012 – current to assess the environmental conditions at the site. This information was confirmed during MDEQ-RRD liability examination prior to conducting site investigations on behalf of the City. Under this grant a Phase I ESA in compliance with ASTM E1527-13 standards will be conducted by a qualified environmental consultant.

iv) Post-Acquisition Uses

Since acquisition of the property/site in 1919, Detroit has solely utilized the property/site as a public park. The city of Detroit intends to continue to utilize the subject site as a public park in perpetuity.

v) Continuing Obligations

Two limited Phase II subsurface investigations were conducted to assess and evaluate the existing site conditions. The City remains committed to monitoring on site conditions and limit the exposure of the known hazardous substances. In addition, MDEQ-RRD on behalf of the City is currently monitoring the site. The City will comply with all state and federal regulations regarding environmentally contaminated properties. The city of Detroit is cognizant of the potential risks, from impacted soil and groundwater, to human health and/or the environment. With this said, the Riverside Park (Parcel #3) property/site has been closed to the public since March 2012. Detroit will utilize the site assessment grant funds to conduct a comprehensive investigation to determine if there are current releases, prevent a future release, and work with state and federal agencies to prevent or limit exposure to any previously released hazardous substance.

The city of Detroit confirms and commits to comply with all potential land-use restrictions and/or institutional controls. Detroit will work cooperatively with those performing the site assessment activities and provide access to the site. The city of Detroit will comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices.



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

December 10, 2014

The Honorable Mike Duggan
Mayor of Detroit
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 1126
Detroit, Michigan 48226

Dear Mayor Duggan:

SUBJECT: Letter of Acknowledgement for a United States Environmental Protection Agency
Brownfield Site-Specific Assessment Grant

The purpose of this letter is to respond to the city of Detroit's request for acknowledgment and support of a proposal to the United States Environmental Protection Agency (EPA) for a brownfield grant under Title II, Subtitle A, of the Small Business Liability Relief and Brownfields Revitalization Act of 2002. The Michigan Department of Environmental Quality (DEQ), Remediation and Redevelopment Division, has reviewed the information you provided and both acknowledges the city of Detroit's proposal and supports the brownfield redevelopment initiatives within the city.

The city of Detroit is applying for a Site-Specific Hazardous Substance Assessment grant for \$200,000 with a funding limit waiver of \$150,000 (total \$350,000) in order to complete a hazardous substances assessment at the Riverside Park, 3085 West Jefferson Avenue in Detroit. Detroit is the hub of economic activity for Southeast Michigan and the state. Having recently emerged from Chapter 9 Bankruptcy (Municipal Bankruptcy), Detroit looks forward to a better future; however, the city has one of the highest poverty rates in the United States, and suffers from disinvestment and abandonment of its once productive industrial areas. The city looks to concentrate its efforts on rehabilitating and redeveloping brownfields in order to attract further investments and grow the regional economy. This federal funding would be a key element in the city's plans.

The city of Detroit is considered eligible for this grant as a general purpose unit of local government. Should the EPA award the grant to the city of Detroit, it will ensure that this property is accurately assessed prior to remediation, leading to an improved environment and economic development. If you have any questions or need additional information, you may contact me at the number below.

Sincerely,

Carrie Geyer, Chief
Brownfield Redevelopment Unit
Remediation and Redevelopment Division
517-284-5182

cc: Ms. Romona Smith & Brad Bradley, USEPA Region 5



CITY OF DETROIT
RECREATION DEPARTMENT
ADMINISTRATION OFFICE

December 15, 2014

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The Honorable Mike Duggan
Mayor of Detroit
Coleman A. Young Municipal Center
2 Woodward Avenue, Ste 1126
Detroit, Michigan 48226

SUBJECT: Letter of Commitment of Leveraged Funds for the Riverside Park Project

Dear Mayor Duggan

The City of Detroit Recreation Department (Recreation) is excited to be part of the City of Detroit USEPA Brownfields Site Specific Assessment Grant and is committed to leveraging an additional \$400,000 from Recreation-PARTNERS & General Obligation Bonds. This investment will be used for park improvements, including benches, drinking fountains and additional launch ramp improvements. This letter expresses our participation and support as the owner and operating manager.

In August 2011, Riverside Park was closed by Recreation due to contamination observed while making park improvements. The closure of the park has devastated the surrounding community, as the park allowed for residents to enjoy a green space venue within walking distance of their homes and provided an enjoyable destination place where children played, picnics, fishing, little league baseball and soccer games, as well as tournaments were once held.

I want to personally thank the City of Detroit through it's Building's, Safety Engineering & Environmental Department (BSEED) for their leadership in seeking funds to conduct site assessment activities at Riverside Park, as it will speed up remediation of this property which will ultimately lead to the reopening of the park, park improvements, and continued investment within our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Alicia C. Bradford".

Alicia C. Bradford, Director
Detroit Recreation Department
Executive Office
18100 Meyers Rd
Detroit, MI 48235
(313) 224-1123
BradfordA@detroitmi.gov

cc: Brad Bradley, USEPA Region V
Romona Smith, USEPA Region V
Mr. Eric Jones, BSEED
Mr. Raymond Scott, BSEED



DETROIT RIVERFRONT CONSERVANCY

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December 18, 2014

The Honorable Mike Duggan
Mayor of Detroit
Coleman A. Young Municipal Center
2 Woodward Avenue, Ste 1126
Detroit, Michigan 48226

SUBJECT: Letter of Commitment of Leveraged Funds for the Riverside Park Project

Dear Mayor Duggan,

This letter is in response to our funding commitment and support of the City of Detroit USEPA Brownfields Site Specific Assessment Grant proposal for Riverside Park. The Detroit Riverfront Conservancy (Conservancy) is the Authority Managing the Detroit International Riverwalk (Riverwalk). The Conservancy is also responsible for facilitating events to fund construction and operations of the Riverwalk. The Riverwalk, upon completion, will be 5 1/2 miles of contiguous, beautiful and accessible riverfront public space.

To date, the Conservancy (DRFC) has spent approximately \$65 million developing the first phase of the Riverwalk, the East Riverfront (3 1/2 miles). The east Riverwalk is populated with approximately three million visitors annually who come to walk, run, bike, spend time with family and friends and take advantage of the quality of life opportunity a revitalized riverfront provides. The focus has now shifted towards the West Riverfront (2 miles) that encompasses Southwest Detroit (the Targeted Community) and will terminate at Riverside Park. The west Riverwalk will mirror the developments along the east Riverwalk with attractions including parks, plazas, pavilions, pathways and open green space. The Conservancy plans to spend approximately \$8 million at Riverside park. This investment will be used for the development of a plaza, pavilion, restroom facilities, concession space, as well as beautiful garden room areas. In total, the Conservancy estimates spending several million dollars on the west Riverfront development. This letter expresses our participation and support as the Authority, funding source, and operating manager for the Riverwalk.

The closure of the park has had a devastating effect on the surrounding community, as the park brought families together, hosted popular little league baseball and soccer games, provided a venue for picnics, fishing, and various tournaments.

Through this grant, the City of Detroit Building's, Safety Engineering & Environmental Department (BSEED) will be able to conduct environmental site assessment activities at Riverside Park that will lead to the remediation of the property and allow the Conservancy to continue the Riverwalk and make the necessary improvements along the Riverfront.

Sincerely,

A handwritten signature in black ink, appearing to read "Will Smith", written in a cursive style.

William A. Smith
Chief Financial Officer

cc: Brad Bradley, USEPA Region V,
Romona Smith, USEPA Region V
Mr. Eric Jones, BSEED,
Mr. Raymond Scott, BSEED
Mark Wallace, President and CEO, DRFC



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 16, 2014

The Honorable Mike Duggan
Mayor of Detroit
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 1126
Detroit, Michigan 48226

Dear Mayor Duggan:

SUBJECT: Letter of Commitment and Support for the City of Detroit FY 2015
U. S. Environmental Protection Agency Brownfields Site-Specific
Assessment Grant

This letter is in response to our participation and support of the U. S. Environmental Protection Agency (U.S. EPA), 2015 Brownfields Assessment Grant proposal being submitted by the city of Detroit, Buildings, Safety Engineering and Environmental Department (BSEED). The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), Southeast Michigan District Office, reviewed the information provided by the BSEED and concurs with our role in supporting the BSEED's efforts. The purpose of the Site-Specific Assessment Grant funds would be to assess hazardous substance contamination at Riverside Park Parcel #3, located at 3085 West Jefferson Avenue, Detroit.

The DEQ ensures contaminated properties are reliably managed, revitalized, and the environment is protected. The DEQ is responsible for providing compliance assistance, establishing and maintaining partnerships within the regulated community, collaborating with stakeholders, and enforcement. In the past three years, the DEQ has been working cooperatively with the BSEED to assess environmental conditions at Riverside Park Parcel #3.

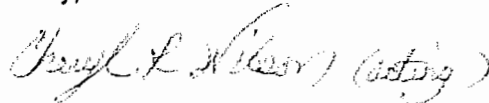
To date, the DEQ spent \$160,000, to conduct a limited remedial investigation. The previously identified \$160,000, was funded by the DEQ's Surface Water Quality Initiative Funding (SWQIF) contract. A SWQIF contract is limited to response activities required to address existing or imminent unacceptable risks arising from conditions that contribute to nonpoint source water pollution. Under the SWQIF contract, remedial investigation activities are limited to an evaluation of environmental contaminants and associated pathways that may be venting to a surface water body (e.g. – Detroit River). Due to the constraints of the SWQIF contract, the DEQ is unable to conduct a full assessment of the environmental conditions at Riverside Park Parcel #3. For example, the DEQ is unable to investigate the environmental condition of the direct contact (e.g. soils that may come into contact by park visitors), soil volatilization to indoor air (e.g. – air within an on-site building), and ambient air pathways (e.g. – volatilization or organic compounds from contaminated soil or groundwater into the ambient air).

The intent of the Site-Specific Assessment Grant is to complement the historical investigation activities conducted by the DEQ and complete a full site assessment. The Site-Specific Assessment Grant would allow the BSEED to investigate and close data gaps the DEQ is currently unable to explore. The DEQ and the BSEED will work cooperatively to strive toward the completion of a full site assessment and ensure use of the grant monies is maximized.

The DEQ commits its resources based on the following information. The city of Detroit is requesting \$200,000, with a funding limit waiver of \$150,000 (total \$350,000), to conduct hazardous substance contamination assessment activities at Riverside Park Parcel #3. The proposed activities will assist with project planning and site remediation; which will serve to remove a current threat to health and safety, and attract new investment to the area. Collectively, with the city of Detroit and the regulated community, our ultimate goal is to re-open this once viable and accessible park that has been closed for the past three years. The DEQ's role will be related to: 1) advising and providing technical assistance on assessment activities; 2) assisting with project planning; 3) providing data from the information collected from our current environmental activities; 4) assisting with remedial planning; and 5) providing recommendations to the BSEED on re-opening the Riverside Park.

We appreciate this opportunity to continue to work with you in a collaborative manner, and look forward to completing this important task.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gerald L. Tiernan (acting)".

Gerald Tiernan, Assistant District Supervisor
Southeast Michigan District Office
Remediation and Redevelopment Division
tiernang@michigan.gov
586-753-3818

cc: Mr. Eric Jones, City of Detroit
Mr. Raymond Scott, City of Detroit
Mr. Brad Bradley, U.S. EPA
Ms. Romona Smith, U. S. EPA
Mr. Josh Scheels, DEQ



Southwest Detroit Environmental Vision

P.O. Box 9400, Detroit MI 48209

Tel: (313) 842-1961

Fax: (313) 842-2158

SDEVweb.info@gmail.com

www.sdevweb.org

December 10, 2014

The Honorable Mike Duggan
Mayor of Detroit
Coleman A. Young Municipal Center
2 Woodward Avenue, Ste 1126
Detroit, Michigan 48226

**SUBJECT: Letter of Commitment/Support for the City of Detroit FY 2015 USEPA
Brownfields Site-Specific Assessment Grant**

Dear Mayor Duggan,

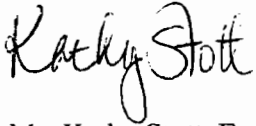
This letter is in response to our participation and support to the United States Environmental Protection Agency (USEPA) 2014 Brownfields Cleanup Grant. Southwest Detroit Environment Vision (SDEV) has reviewed the information you provided and concurs with our role with the City of Detroit efforts. The purpose of the Site-Specific Assessment Grant funds would be to assess hazardous substance contamination at Riverside Park (Parcel #3), located at 3085 West Jefferson Ave., Detroit.

SDEV is a nonprofit organization and since its inception (1993) has been working to improve the environment and economy by communicating environmental risks and solutions, being advocates for improved community development, and expanding common ground to address issues such as air/water quality, contaminated sites, pollution prevention, environmental justice and education to the community.

SDEV commits its resources based on the following information. The City of Detroit is requesting \$200,000 with a funding limit waiver of \$150,000 (total \$350,000) to conduct hazardous substance contamination assessment activities at Riverside Park, Detroit. These activities will assist the ultimate cleanup of this site which will serve to attract new investments. SDEV's role will be related to: 1) disseminating project related information to the residents within the Southwest Detroit community; 2) assist with coordinating public meetings and community outreach; and 3) playing an active role in coordinating future uses as it relates to green space development.

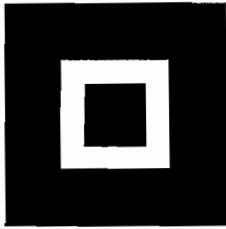
The City of Detroit proposal will garner funding for investment and redevelopment that will enhance our park, improve the quality of life for the residents and improve the area economically, socially, and most importantly, environmentally. We appreciate this opportunity to work with you in a collaborative manner.

Sincerely,

A handwritten signature in black ink that reads "Kathy Stott". The signature is written in a cursive, flowing style.

Ms. Kathy Stott, Executive Director
Southwest Detroit Environment Vision
P.O. Box 9400
Detroit, MI 48209
Kathy.sdev@gmail.com

cc: Brad Bradley, USEPA Region V
Romona Smith, USEPA Region V
Mr. Eric Jones, BSEED
Mr. Raymond Scott, BSEED



SOUTHWEST DETROIT

B U S I N E S S A S S O C I A T I O N

December 10, 2014

The Honorable Mike Duggan
Mayor of Detroit
Coleman A. Young Municipal Center
2 Woodward Avenue, Ste 1126
Detroit, Michigan 48226

SUBJECT: Letter of Commitment/Support for the City of Detroit FY 2015 USEPA Brownfields Site Specific Assessment Grant

Dear Mayor Duggan,

Southwest Detroit Business Association is excited to play a key role in the City of Detroit USEPA Brownfields Site Specific Assessment Grant. This letter expresses our participation and support as an economic development partner.

Established in 1957, the Southwest Detroit Business Association supports our community's vision for a healthy, vibrant neighborhood. The Association is a coalition of businesses and community interests committed to facilitating the continuation and enhancement of a stable, economically healthy Southwest Detroit and its neighboring communities. We accomplish this by employing strategies that support existing business and industrial enterprises, enhance the climate for public and private investment and economic growth, and act as a vehicle for cooperative ventures that support economic development in Southwest Detroit. As you can see, our mission closely aligns with the mission of the City of Detroit. The Association will assist in involving its network of residents and businesses in the effort of assessing hazardous contamination at Riverside Park (Parcel #3), disseminating project related information to the community, and putting the park back to use once the site is ultimately remediated.

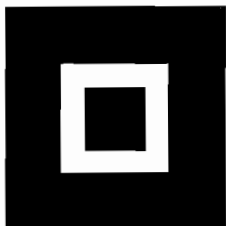
I want to personally thank the City of Detroit for their leadership in seeking funds to conduct the aforementioned efforts as it will speed up the ultimate remediation of this property which will lead to continued investment within our community.

Sincerely,

Kathleen Wendler, President
Southwest Detroit Business Association
7752 W. Vernor Hwy. Detroit, MI 48209
kwendler@southwestdetroit.com
(313)842-0986

7752 WEST VERNOR HIGHWAY DETROIT, MI 48209-1516
T 313 842 0986 F 313 842 6350 WWW.SOUTHWESTDETROIT.COM

BUSINESS BUILDING COMMUNITY. COMMUNITY BUILDING BUSINESS.



SOUTHWEST DETROIT

B U S I N E S S A S S O C I A T I O N

cc: Brad Bradley, USEPA Region V
 Romona Smith, USEPA Region V
 Mr. Eric Jones, BSEED
 Mr. Raymond Scott, BSEED

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E-MAIL: rashidatlaib@house.mi.gov

MICHIGAN HOUSE OF REPRESENTATIVES

RASHIDA TLAIB
STATE REPRESENTATIVE

December 10, 2014

The Honorable Mike Duggan
Mayor of Detroit
Coleman A. Young Municipal Center
2 Woodward Avenue, Ste 1126
Detroit, Michigan 48226

RE: Letter of Support Regarding the City of Detroit's Proposal for a United States Environmental Protection Agency's Brownfield Site-Specific Assessment Grant

Dear Mayor Duggan,

I am writing to express my strong support for the city of Detroit's proposal to the United States Environmental Protection Agency (EPA) for a brownfield grant under Title II, Subtitle A, of the Small Business Liability Relief and Brownfields Revitalization Act of 2002 (the Brownfields Law).

I welcome the city of Detroit in applying for a Site-Specific Assessment grant for \$200,000 with a funding limit waiver of \$150,000 (total \$350,000) in order to perform hazardous substances contamination assessment activities at Riverside Park (Parcel #3), located at 3085 West Jefferson Avenue.


The city of Detroit is the hub of economic activity for Southeast Michigan and the State. Detroit has recently emerged from Chapter 9 Bankruptcy (Municipal Bankruptcy) and looks forward to a better future; however, the city has one of the highest poverty rates in the United States, and suffers from disinvestment and abandonment of its once productive industrial areas. Southwest Detroit, in particular, suffers from this disinvestment and prior industrial contamination, making it one of the most contaminated spots in the State of Michigan. This federal funding would be a key element in the city's efforts to make this area safer and healthier for its residents and visitors. Riverside Park is Southwest Detroit's only park with riverfront access, and concerns about contamination have kept families from enjoying the space where children once played, baseball tournaments and soccer games were held.

As State Representative for Michigan's 6th District, which includes Southwest Detroit, my office is well aware of the environmental issues and the need for this kind of effort in this area. These activities will pave the way for the ultimate cleanup of the site. My office has agreed to help with community outreach efforts and to help disseminate information to my constituents and

community members. Riverside Park is Southwest Detroit's only park with riverfront access, and their concerns about contamination have kept families from enjoying the space where children once played. Residents are eager to see the park cleaned up.

The city of Detroit's proposal will ensure that the property is properly remediated, leading to an improved environment and economic development. I strongly support the efforts to address the contamination at this site.

Sincerely

A handwritten signature in black ink, appearing to read "Rashida Tlaib", with a stylized flourish at the end.

Rashida Tlaib
State Representative
6th District, Detroit, Ecorse, River Rouge

cc: Brad Bradley, USEPA Region V
Romona Smith, USEPA Region V
Mr. Eric Jones, BSEED
Mr. Raymond Scott, BSEED

**SUBJECT: Waiver of the Funding Limit Justification Letter, City of Detroit FY 2015
USEPA Brownfields Site-Specific Assessment Grant**

This letter is provided as the city of Detroit's official request for a waiver of the Site Specific Assessment Grant funding limit and request for an additional \$150,000.00. The site specific assessment will be conducted on Riverside Park (Parcel #3), which is located in the southeastern region of our Southwest Detroit Community. Parcel #3, known as the area of concern, is an open recreational space, approximately 10 acres which serves as the community's primary outdoor recreational venue. The city of Detroit Recreation Department (Recreation) has owned and operated Riverside Park for over ninety-five (95) years. Following assessment activities and remediation, Recreation will reopen the park and continue to operate as a public park.

There have been two assessments conducted at Riverside Park. The first assessment was a limited Phase II environmental site assessment (ESA) by the city of Detroit, and a subsequent environmental investigation conducted by the Michigan Department of Environmental Quality (MDEQ). The city's limited Phase II ESA was conducted to investigate site conditions when mobile non-aqueous phase liquids (NAPL) were observed during site improvement construction. Due to the city's financial condition and its recent emergence from the largest Chapter 9 Municipal Bankruptcy in this country's history, Detroit does not have the ability to finance additional site assessment activities. Therefore, at our request, MDEQ allocated the State of Michigan's Surface Water Quality Initiative Fund (SWQIF) in the amount of \$160,000.00 to further investigate and attempt to delineate the source area.

MDEQ has been working with the city on this site for the past 3 years. Under SWQIF, remedial investigation activities are limited to evaluating environmental contaminants, and associated pathways, that may be venting to a surface water body (Detroit River). Due to the constraints of SWQIF, the MDEQ is unable to directly evaluate the direct contact, soil volatilization to indoor air, or the ambient air pathways.

The city is requesting a waiver in order to provide information to close the data gaps between the two previous investigations and develop a focus feasibility that will allow for remedial options to be developed for the city's implementation. Our understanding in working collaboratively with MDEQ is that the groundwater/surface water issues have clearly been delineated. However, direct contact, soil volatilization to indoor air, or the ambient air pathways need to be clearly understood in order to summarize a comprehensive assessment of the site. It is estimated that the remaining work required for the city to come to a point where remediation can be realized will cost approximately \$350,000.00. This grant, including requested waiver, is vital in continuing the efforts already conducted by the city and MDEQ.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ray A. Scott', is written over a horizontal line.

Raymond A. Scott, M.P.H., General Manager
Buildings, Safety Engineering and Environmental Department

cc: Brad Bradley, USEPA Region V
Romona Smith, USEPA Region V
Mr. Eric Jones, Director-BSEED